## Office of Chief Counsel Internal Revenue Service **Memorandum**

Number: 200715011

Release Date: 4/13/2007

CC:TEGE:EOEG:ET1 POSTN-101756-07

UILC: 3231.01-00

date: March 2, 2007

to: Director, Submission Processing

Cincinnati, OH Attn: Entity Unit

from: Office of Division Counsel/Associate Chief Counsel

Tax Exempt & Government Entities

subject: Railroad Retirement Tax Act Status

In accordance with the coordination procedure established between the Service and the Railroad Retirement Board (RRB), the RRB has provided us with its opinion that the following business is an employer under the Railroad Retirement Act and the Railroad Unemployment Insurance Act

We have reviewed the opinion of the RRB and, based upon the information submitted to us by the RRB, we also conclude that is an employer under the Railroad Retirement Tax Act. Please take the appropriate action regarding this business.

Janine Cook	